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July 2, 2012

The Honorable Nicholas G. Garaufis
United States District Judge
Eastern District of New York
271 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Ronell Wilson, Docket No. 04-CR-1016 (NGG)*

Dear Judge Garaufis,

On June 29, 2012, the government filed a letter in which it was explained that counsel for Mr. Wilson consented to the government's request for appointment of an Assistant United States Attorney from the Eastern District of New York to act as "taint" counsel for these proceedings. On behalf of Mr. Wilson, I wish to clarify that all the government seeks – and all that we consented to – is appointment of a lawyer to remove sealed material from the government's files. The individual would remove the material and isolate it in a safe place where it would be unavailable to anyone (including the "taint" prosecutor) without further order of the court, leaving the current prosecutors free to access the balance of their files without concern that they might encounter sealed material.

Respectfully submitted,

/s/
Michael N. Burt
Attorney for Ronell Wilson